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Malachowsky, Daniel F. Vivoli, Curtis R. Priem, Mark L. Perry,
Steven Chu, Mary Dotz, Marvin Burkett, and David M. Shannon

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

In re NVIDIA CORP. DERIVATIVE
LITIGATION,

This Document Relates To:

ALL ACTIONS.

Master File No. C-06-06110-SBA

**STIPULATION AND ~~PROPOSED~~
ORDER REGARDING BRIEFING
SCHEDULE ON DEFENDANTS'
MOTIONS TO DISMISS
PLAINTIFFS' CONSOLIDATED
VERIFIED SHAREHOLDERS
DERIVATIVE COMPLAINT**

1 The parties, by and through their respective counsel of record, hereby stipulate, and jointly
2 move the Court for an Order, as follows:

3 WHEREAS, by Stipulation and Order dated April 24, 2007, this Court established a
4 briefing schedule whereby:

5 (i) defendants were required to file their motions to dismiss plaintiffs' Consolidated
6 Verified Shareholders Derivative Complaint on or before May 15, 2007;

7 (ii) plaintiffs were required to file their opposition brief(s) on or before July 2, 2007;

8 (iii) defendants were required to file their reply brief(s) on or before July 23, 2007; and

9 (iv) a hearing on the motions to dismiss was to occur on a date thereafter convenient to the
10 Court;

11 WHEREAS, in compliance with the Court's Stipulation and Order dated April 24, 2007,
12 all of the defendants in this case filed their respective motions to dismiss on May 15, 2007;

13 WHEREAS, the hearing on the motions has been set on the Court's calendar for July 31,
14 2007 at 1:00 p.m. before the Honorable Sandra Brown Armstrong, in the U.S. District Court,
15 Northern District of California, Oakland Division; and

16 WHEREAS, in light of the above, and in order to provide plaintiffs with more time to
17 respond to the motions to dismiss, while also accommodating the Court's July 31, 2007 hearing
18 date, the parties have met and conferred, and stipulated to a revised briefing schedule.

19 NOW, the parties stipulate as follows:

20 (i) Lead Plaintiffs shall file their opposition brief(s) to defendants' motions to dismiss on
21 or before July 13, 2007; and

22 (ii) the defendants' shall file reply brief(s) in support of their motions to dismiss on or
23 before July 24, 2007.

24 **IT IS SO STIPULATED.**

1 Dated: June 19, 2007

RESPECTFULLY SUBMITTED

2 ORRICK, HERRINGTON & SUTCLIFFE LLP

3
4 /s/ James N. Kramer

JAMES N. KRAMER

5 Attorneys for Nominal Defendant NVIDIA
6 Corporation and Defendants Jen-Hsun Huang,
7 Tench Coxe, James C. Gaither, Harvey C. Jones,
8 Jr., William J. Miller, A. Brooke Seawell, Mark A.
9 Stevens, Jeffrey D. Fisher, Chris A. Malachowsky,
Daniel F. Vivoli, Curtis R. Priem, Mark L. Perry,
Steven Chu, Mary Dotz, Marvin Burkett, and
David M. Shannon

10 *I, James N. Kramer, am the ECF user whose ID and password are being used to file this*
11 *Stipulation and [Proposed] Order Revising Briefing Schedule. In compliance with General*
12 *Order 45, X.B., I hereby attest that Travis E. Downs III has concurred in this filing.*

13 Dated: June 19, 2007

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16 /s/ Travis E. Downs III

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1 *Stipulation and [Proposed] Order Revising Briefing Schedule. In compliance with General*
2 *Order 45, X.B., I hereby attest that Jeffrey W. Golan has concurred in this filing.*

3 Dated: June 19, 2007

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14 Counsel for Co-Lead Plaintiff LIUNA Staff &
15 Affiliates Pension Fund

16 *I, James N. Kramer, am the ECF user whose ID and password are being used to file this*
17 *Stipulation and [Proposed] Order Revising Briefing Schedule. In compliance with General*
18 *Order 45, X.B., I hereby attest that Stephanie M. Byerly has concurred in this filing.*

19 Dated: June 19, 2007

20 HOWREY LLP
21 LEIGH A. KIRMSSE
22 KARIN KRAMER
23 STEPHANIE BYERLY

24 /s/ Stephanie M. Byerly
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Attorneys for Defendant Christine B. Hoberg

* * *

ORDER

Based on the stipulation of the signed parties, and good cause appearing, IT IS HEREBY ORDERED that the Court's Order of April 24, 2007 is amended to provide that: (i) Lead Plaintiffs shall file their opposition brief(s) to defendants' motions to dismiss on or before July 13, 2007; and (ii) the defendants shall file reply brief(s) in support of their motions to dismiss on or before July 24, 2007.

IT IS SO ORDERED.

DATED: 6/22/07



THE HONORABLE SAUNDRA B. ARMSTRONG
UNITED STATES DISTRICT JUDGE